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Pursuant to Local Rule 6-2(a), defendants VENETIAN CASINO RESORT, LLC, LAS VEGAS SANDS, LLC, and LAS VEGAS SANDS CORP. (collectively "Defendants") and plaintiff JONATHAN BROWNING, INC. ("Plaintiff"), hereby stipulate to and request the Court enter the proposed Revised Schedule as set forth herein.

IT IS HEREBY STIPULATED, by the parties hereto, through their respective counsel, that both Defendant and Plaintiff agree to a forty-five day extension of time for the deadlines listed herein. The current deadlines for this case are as follows:

Completion of All Expert Discovery: April 10, 2009

Opposition to Motion to Strike March 20, 2009

Reply to Motion to Strike March 27, 2009

Hearing on Motion to Strike May 8, 2009

Hearing on Dispositive Motions: May 29, 2009

Pre-Trial Conference: August 3, 2009

Trial: August 24, 2009

These dates have previously be extended twice by the mutual agreement of the parties and the approval of this Court. Good cause to extend these dates can be found on the grounds that this short extension of time will allow the parties to attend mediation to resolve all claims. Mediation is currently scheduled to take place on April 17, 2009 before a private mediator. All parties, including the third-party defendant have agreed to attend private mediation in an effort to resolve all claims between all parties. This extension will allow all the parties to focus their time, energy and resources to resolving their disputes prior to completing expert discovery and preparing and filing respective summary judgment motions.

Thus, the parties hereby stipulate to and request that the Court approve and enter the following Revised Schedule:

Opposition to Motion to Strike May 4, 2009

Reply to Motion to Strike May 11, 2009

Hearing on Motion to Strike

— June 22, 2009 June 19, 2009 at 9:00 a.m.

Completion of All Expert Discovery: May 26, 2009

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July 13, 2009 July 10, 2009 at 9:00 a.m. Hearing on Dispositive Motions: Pre-Trial Conference: 2 September 17, 2009 September 21, 2009 at 2:00 p.m. 3 Trial: October 13, 2009 4 SO STIPULATED. 5 6 Dated: March 20, 2009 DUANE MORRIS LLP 7 By: s/ Michelle A. Hon 8 Ray L. Wong Michelle Hon 9 Attorneys for Third-Party Plaintiffs VENETIAN CASINO RESORT, LLC, LAS VEGAS SANDS, LLC, 10 and LAS VEGAS SANDS CORP. 11 Dated: March 20, 2009 **McNamer and Company** 12 By: <u>s/Anthony McNamer</u> 13 Anthony McNamer Attorneys for Plaintiff 14 JONATHAN BROWNING INC. 15 16 PURSUANT TO STIPULATION, IT IS SO ORDERED 17 Dated: March $\frac{23}{2}$, 2009 18 By: 19 20 21 22 23 24 25 26 27 28 C 07-3983 JSW

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